

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

TABITHA WILLIAMS, a person,

C17-1113 RSM

**Plaintiff.**

V.

**STIPULATION AND ORDER FOR 2-DAY  
EXTENSION OF DISCOVERY  
DEADLINE;**

FOREMOST INSURANCE COMPANY  
GRAND RAPIDS MICHIGAN, an insurance  
company.

**Defendant:**

## I. STIPULATED REQUEST

All parties respectfully request that the Court extend the discovery deadline for two days, to April 18, 2018, for the deposition of Rebecca Cremin.

## II. FACTS

The parties have been working for several months to schedule the deposition of Rebecca Cremin. Ms. Cremin was John Blanchard's supervisor and was one of the employees involved in the coverage denial in this matter. Counsel for both Plaintiff and Defendant both believed that Ms. Cremin lived in Washington state and that her deposition would be relatively easy to schedule. However, counsel for Defendant later learned that she has moved to New Mexico. The parties also learned that the calendars of Ms. Cremin, Plaintiff counsel, and Defense counsel

1 prevented them from being available to conduct her deposition in New Mexico until the week of  
2 April 18, 2018. Accordingly, counsel for both parties have arranged travel for her deposition on  
3 April 18. Presently, the discovery deadline in this case is April 16, 2018. (Dkt. No. 10.)

4 DATED this 20<sup>th</sup> day of March, 2018.

5 JOEL B. HANSON, ATTORNEY AT LAW, PLLC

6 /s/ Joel Hanson  
7 Joel B. Hanson, WSBA #40814  
8 Attorney for Plaintiff

9 DATED this 20<sup>th</sup> day of March, 2018.

10 LETTER & ASSOCIATES, PLLC

11 /s/ Eric Neal  
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16 Counsel for Defendant Foremost Insurance Company  
17 Grand Rapids Michigan

18 **IT IS HEREBY ORDERED** this 23<sup>rd</sup> day of March that the parties' Stipulated Motion  
19 for a 2-Day Extension of the Discovery Deadline is GRANTED. The discovery deadline is moved  
20 to April 18, 2018 for the purpose of taking the deposition of Rebecca Cremin only.

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23 RICARDO S. MARTINEZ  
24 CHIEF UNITED STATES DISTRICT JUDGE